

Thank you for the opportunity to comment on RM-10867, Although I am Chairman of the Question Pool Committee (QPC) of the National Conference of Volunteer Examiner Coordinators (NCVEC), my comments are personal and do not necessarily represent those of the QPC or the NCVEC. However, they are based on my experience as a member of the QPC since 1996 and as chair since August 2000.

I am in general agreement with the principles in RM-10867 and urge the commission to adopt a rule that incorporates these ideas. However, there are a few areas where I respectfully request that the commission deviate from RM-10867.

1. Element 1 (CW) Testing: The commission should drop all CW testing requirements for any Amateur Radio Service license. Morse code has a long and distinguished history in Amateur Radio, but technology is an ever evolving entity. The original purposes for CW testing are no longer required from an operational or regulatory standpoint. RM-10867 requests that the present Element 1 test be retained as a requirement for the Amateur Extra Class license. This request serves no regulatory or operational purpose and will complicate the administrative procedures for Amateur Extra class testing and licensing. Sending a message at five words per minute is excruciatingly slow means to convey a meaningful message and is hardly demonstration of proficiency in Morse code. In my opinion it does not represent a level of achievement that the commission should recognize as a requirement for an Amateur Radio Service license, just as the international community no longer requires such a demonstration.

As the international treaty Morse code requirement is *passé*, the Americans with Disabilities Act (ADA) come into play. The whole issue of “reasonable accommodation” for a disability becomes an issue. I have already had individuals at testing sessions seek a waiver to the existing Morse code requirements due to the change in the international treaty. If Morse code is retained the commission will have to adopt procedures to deal with waiver requests. This was a torturous undertaking for the 13 WPM and 20 WPM tests prior to April 15, 2000.. This topic consumed more time than any other subject in FCC—VEC—VE communications. It will be equally torturous and consume as much of the Commission’s time for a 5 WPM test whose only apparent function is to demonstrate proficiency for a signal communications mode with an old and honorable history.

2. Title of new entry level license: The new entry level license should have a title that precludes any confusion with the existing or previous license classes. It should not be called Novice, the potential for confusion with two licenses have the same name yet different privileges are obvious. Particularly if existing Novices are not automatically converted to the new entry level license. I recommend “Communicator”, it has been suggested as a name for the new entry level license. It is different and has never been used before.

The comments below are in support of aspects of RM-10867 based on my experience as Chair of the QPC.

3. Automatic upgrade of Novice to “new entry class”, Technicians to General and Advanced to Extra: RM-10867 and RM 10870 both advocate that existing

Technicians be upgrade to General as part of this effort and the existing Technician license be abolished. They advocate an identical process for Advanced to Extra. Prior to 1987 the written examination for Technician and General were the same (Element 3). Since that time the QPC has adjusted the now Element 2 (Technician) and Element 3 (General) Pool to put more emphasis on HF operations in the Element 3 question pool. However, Technician licensees with credit for Element 1 (Morse code) have HF privileges; therefore the QPC has left some HF operations and propagation questions in the Element 2 pool. Granting existing Technician licensees General licensee privileges and granting existing Novices the new entry level privileges is not granting either class of licensee a set of privileges to which they haven't previously been exposed or examined. This is even truer for Advanced Class licensees upgraded to Amateur Extra, where the differences are primarily in frequency privileges. The material in the formal Element 4A Advance question pool has been incorporated into the current Element 4 (Extra) question pool. The amateur service has no recurring examination requirement; instead it relies on the initiative of the licensee to maintain currency on those items already tested and to obtain proficiency on new modes, techniques and methods by self study. Numerous publications already exist and are widely available to assist a ham in exploring his/her new privileges. The entire tradition of "Elmering" within the Amateur Radio Service is an example of the assistance available within the Amateur community. In short, additional testing is not required for these upgrades. The commission can print a new license document in the new (upgraded) class when the license is renewed or modified..

4. Call sign assignment for the "new entry level" license: RM-10867 did not explicitly address this issue. I would urge the commission to continue its present call sign assignment structure. The "new entry level" licensee should not have a call signs format that is unique to only his/her class of license. To do so would "ghettoize" the new licensee. Unfortunately some amateur operators have been extremely rude to new licensees, with comments such as "Your not a real ham", etc. I realize that some old timers recall their youth and their eagerness to change their WN#XXX call to W#XXX, but the world has changed and there is no requirement that a "new entry level" licensee ever upgrade.

Respectfully submitted

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